# Before The FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C.

In the matter of:	)	)	
	)		
Amendment of Part 74 of the Commission's	)	RM-10609	
Rules to Permit Satellite Feeds to	)	KWI-10009	
Noncommercial Educational FM Translators	)		
Operating on Commercial Frequencies	)		

# **REPLY COMMENTS OF REC NETWORKS**

REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners.

REC files these *Reply Comments* to pleadings made by Calvary Chapel of Twin Falls, Creative Educational Media Inc., Positive Alternative Radio, Inc. and Priority Radio, Inc. (collectively, "Petitioners") and to initial comments made by National Public Radio, Inc. ("NPR").

### REC does not oppose local translators

In their comments<sup>1</sup>, the Petitioners stated that REC has a strong bias against the FM Translator Service. Anything can be further from the truth. Even though we follow broadcast issues on a nationwide scope, we focus our efforts on the needs of Arizona, Nevada and Southern California, an area, which we refer to as our "Area of Interest". Many areas, especially in Nevada consist of areas that are underserved by full power FM broadcast stations<sup>2</sup>. Full Power FM stations are blocked in many areas by terrain, which do not make it possible to even receive these services. Therefore, these areas are dependent on translators. REC feels that these translators are necessary to bring in nearby broadcast stations, which will assure that these areas receive Emergency Alert System activations that may apply to their area.

<sup>&</sup>lt;sup>1</sup> - Petitioner's Reply, page 2, paragraph 1.

<sup>&</sup>lt;sup>2</sup> - The term "underserved" can mean that a particular community does not have any broadcast stations licensed to it. See *CampWood and Rocksprings*, *TX (MM Docket 99-214, 15 FCC 10349)*.

What we are opposed to, is the loophole in the current Rules<sup>3</sup> that permits an organization to establish an FM station anywhere in the country and then be able to set up a translator of the same station thousands of miles away.

#### **Definition of "Unserved and Underserved"**

The Petitioners state that we have "mischaracterized" the terminology "unserved and underserved"<sup>4</sup>. The Petitioners then go on to state, "just because a certain geographic area has an abundance of radio stations, it does not mean that all programming niches are being represented there." The Petitioners want you to think that a geographic area, including a large million-plus population center does not have a Calvary Chapel station should be considered "underserved"<sup>5</sup>. The Petitioner's attempt to justify their placing of satellite-fed translators in metropolitan areas by claiming that an area is considered "underserved" if it does not have Calvary's (or similar) programming is asking the Commission to expand the definition of "underserved" to now include entertainment format. The Commission has had a long case history of not regulating a commercial or non-commercial broadcast station's choice of entertainment format <sup>6</sup>. If entertainment format was also considered in the definition of "underserved", then virtually every area in the country would be "underserved". In addition, if the Commission was to accept the Petitioner's argument that a lack of religious programming defines underserved, then the Commission is setting itself up for a potential First Amendment challenge.

<sup>3</sup> - §74.1231(b).

<sup>&</sup>lt;sup>4</sup> - Petitioner's Reply, page 2, paragraph 3.

<sup>&</sup>lt;sup>5</sup> - We note that Calvary's KAWZ programming is also available on the Dominion Sky Angel direct-to-home (DTH) satellite service. In addition, the services of known "satellator" operators Educational Media Foundation, Family Stations, American Family Association, Radio Nueva Vida and others are also available on the service thus giving these organizations a near-nationwide reach without the need for translators. Therefore, these stations are already in virtually every major and minor market.

<sup>&</sup>lt;sup>6</sup> – See Letter re: WDCU(FM), Washington, DC (DA 97-2069). The Commission denied an informal objection of listeners to a station whose license was being assigned and as a result, the entertainment format of the station was changing. "It is well-settled Commission policy that potential changes in programming formats are not considered [in reviewing assignment applications]."

REC reads the *Report and Order* that originally established satellite-fed translators in the reserved band<sup>7</sup> as a method that can be used by broadcasters to deliver programming into areas that do not receive FM services at all because of terrain and that a translator fed over-the-air would not be able to receive a quality signal from the primary station or another translator. Because these areas would have limited or no access to full powered non-commercial FM stations, it is very likely that there would be a place within the reserved band to place the satellite-fed translator.

"White and Grey Areas"8

	Population	
Receives no city grade NCE FM service	9,044,923	4.3%
Receives 1 city grade NCE service	18,936,083	9.2%
No city grade FM service at all	713,591	0.3%

# Petitioner's "Channel 6" Argument

The Petitioner makes claims that due to channel 6 broadcast stations, they are precluded from placing satellite-fed translators in the reserved band in certain areas. While this is currently a valid statement, it has the potential of being a moot subject in most channel 6 markets at the end of the DTV transition. Out of all of the existing full-power NTSC channel 6 TV stations on the air today, two stations, one in Nevada and one in Utah are post-1997 stations that only received one channel. These stations will be expected to change to DTV on the same channel, therefore, they will never transition off of channel 6. Two stations, one in Kansas and one in Montana are current NTSC channel 6 stations and will be transitioning to other VHF-low band 10 channels. Other NTSC channel 6 stations will be transitioning to VHF-hi band 11 or UHF channels. REC feels that many stations that are transitioning to hi-band and UHF channels are

<sup>&</sup>lt;sup>7</sup> - Amendment of Part 74 of the Commission's Rules to Provide for Service and Terrestrial Microwave Feeds to Noncommercial Educational FM Translators Report and Order 3 FCC Rcd 2196 (1988); recon. granted in part, 4 FCC Rcd 6459 (1989).

<sup>&</sup>lt;sup>8</sup> - Based on population centers defined in the U.S. Census Bureau's *Gazeteer*.

<sup>&</sup>lt;sup>9</sup> - However, we do note that both of these stations are located in very rural areas (Ely, Nevada and Vernal, Utah). These two stations should be able to transition to another channel if necessary to protect the NCE-FM service.

<sup>&</sup>lt;sup>10</sup> - VHF low-band channels are TV channels 2 through 6.

<sup>&</sup>lt;sup>11</sup> - TV channels 7 through 13.

more likely to remain on those channels due to the investments the station made in their DTV equipment however those transitioning to low-band channels are more likely to transition back<sup>12</sup>. If these licensees choose to remain on their transition channels, this will substantially reduce the number of TV stations assigned to channel 6 and therefore substantially reducing the areas where reserved-band translators are not available due to channel 6 issues. In addition, two stations, one in Alaska and one in West Virginia will transition to DTV channel 6 from other low-Band VHF channels therefore are likely to transition back to their NTSC channels<sup>13</sup>. Since DTV channel election has been deferred<sup>14</sup>, it's still unknown which stations will be on Channel 6 after the transition. Therefore, we feel that until we know who is remaining on Channel 6, we should not make any decisions based on Channel 6 interference until we know the outcome of the DTV transition<sup>15</sup>.

Based on reports that we have read regarding the potential of interference to reserved band FM stations by DTV Channel 6 stations<sup>16</sup>, we are reluctantly inclined to support the use of distant translators in the non-reserved band, but only under the following conditions:

- The applicant can make a showing that no channels in the reserved band that comply with §74.1205 are available.
- The station would be authorized with a "sub-secondary" status subject to displacement if the applicant of a LPFM or a local translator can make a showing that no other channels are available.

# **Environmental Issues and Microwave Service**

REC has been made aware from some of our supporters that our comments regarding use of microwave facilities in lieu of satellite facilities raise some environmental concerns of microwave RF energy as well as the rise of birds colliding with microwave towers. In these

<sup>&</sup>lt;sup>12</sup> - 12 stations listed in Appendix C are current NTSC channel 6 stations that have been given DTV channels outside the core (channels 52-69). Those stations are more likely to return to Channel 6 than other Channel 6 stations assigned UHF transition channels. Those stations would have to have to petition to amend the DTV Table of Allotments in order to receive a different transition channel.
<sup>13</sup> - See Appendix "C".

<sup>&</sup>lt;sup>14</sup> - See Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television at 16. (16 FCC 20594)

<sup>&</sup>lt;sup>15</sup> - Based on research performed by National Public Radio, we can not see how any DTV stations can be authorized on Channel 6 without creating significant interference to frequencies in the FM reserved band. <sup>16</sup> - See *DTV Channel 6 Interference to NCE-FM Reception. Final Report.* Published © National Public Radio. http://iris.npr.org/euonline/dtvch6/

Reply Comments, we go more in-line with the comments of National Public Radio (NPR) who supports the use of satellite delivery in the cases where the primary station is within a certain radius of the translator. REC originally recommended microwave delivery to address the situations that NPR has now stated is economically possible using satellite delivery. Therefore, we withdraw our suggestion of using microwave delivery as an alternative to satellite delivery in the non-reserved band.

### **NPR Comments Support Local Spectrum Priority**

NPR states <sup>17</sup> that this proposed rule change, without modification "threatens to undermine the one of the bedrock principles underlying the system of broadcasting in the United States--Localism."

NPR proposes restricting satellite fed translators in the non-reserved band to nearby primary (parent) stations and proposes different potential options for determining the criteria of being defined as a local translator including:

- Establishing a fixed-radius based on station's service class.
- Establishing a radius at the 30dBu (50,50 method) service contour of the primary station.
- Within in the same state and for stations near state borders, the adjacent state<sup>18</sup>.

 <sup>17 -</sup> NPR Comments at 2, paragraph 3.
 18 - NPR does not define how close a station has to be to a state line in order to be able to apply for a satellite-fed translator in an adjacent state.

In our comments, we had proposed that the definition of a local translator as being within the same state or out of state but within 400km of the primary/parent station<sup>19</sup>. We feel that this definition is the best for the following reasons:

- It is a fixed amount that would apply to all NCE stations.
- It does not vary the size of the radius based on the class of the station. This is helpful for broadcasters who are in areas where it would be more practical to have a lower class primary station and a network of translators to serve their intended service areas.
- Promotes the use of satellite-fed translators to expand public radio statewide networks.
- It would meet the needs of regional ministries who want to expand their message into nearby areas.
- It can satisfy those situations where the "local" coverage of the station extends to territory in nearby states that are not contiguous.
- It can be easily enforced using the existing formula for determining the distance between FM stations

We feel that these proposed restrictions are reasonable, as it will fulfill the needs of non-commercial broadcasters who wish to extend their signal while still maintaining a degree of localism by protecting non-reserved spectrum for local LPFM stations and local NCE and commercial translators<sup>20</sup>.

# "Sub-secondary" for Distant Translators

The Petitioners state that our request for "sub-secondary" status for Distant Translators is outside the scope of this rulemaking. REC disagrees. We feel that it is appropriate to propose additional LPFM as well as local translator rules in these comments. REC feels that if the Commission thinks it's appropriate to pursue a sub-secondary status for distant translators, we will accept a proposal of sub-secondary status of all distant translators in the reserved band *that* 

<sup>&</sup>lt;sup>19</sup> - If the industry feels that the use of the 30dBu contour instead of the longer 400km radius for determining if a translator should be considered as "distant" would be more desirable, we would support that only under the condition that translators where the primary/parent station are within the same state should be considered as "local" regardless of the distance. This will allow public radio stations in western states and Alaska where there are underserved points outside the 30dBu contour to be able to take advantage of this rule (as well as not be displaced if our proposal for new satellite fed translators in the reserved band is accepted). The 30dBu contour can be used to feed translators that are in other states in cases where the public radio station borders that state. Also, if a 30dBu contour is further considered, that it should be based as if the primary/parent station is non-directional.

<sup>&</sup>lt;sup>20</sup> - See Appendices A and B, as it will compare one of the NPR proposals with the REC proposal as they would apply to two of the largest operators of satellite-fed translators.

are applied for after the implementation of this rulemaking. This way, applicants of Distant Translators after the date of implementation are fully aware that their station is sub-secondary and subject to displacement if no other channel is available for a local LPFM or translator station. If the Commission accepts REC's and NPR's request to restrict satellite-fed translators in the non-reserved band to "non-distant" primary stations, this will be less of an issue since there may be spectrum already in the non-reserved band already set aside for local users.

#### Conclusion

REC feels that the intentions of the existing rules permitting satellite-fed translators in the reserved-band as a way to provide vital FM services into unserved and underserved areas and that this rule was exploited by a small number of broadcasters to build near-nationwide networks while precluding local NCE broadcasters from being able to build translators to expand countywide and statewide networks. The terms "unserved" and "underserved" are based on the number of FM services that a particular area can receive and not the number of entertainment formats in a particular area.

It would not be in the public interest to remove current satellite-fed translators due to the money and time invested in them by the stations and their supporters. However, we can use this opportunity to tie-up a loophole in the existing rule that is contrary to the "bedrock principle underlying the system of broadcasting in the United States - Localism."

We do feel that the time is right to control the proliferation of distant translators. This can be done by **modifying** the Petitioner's proposal to:

- Allow satellite-fed translators in the non-reserved band as originally proposed by the petitioners, *however*...
- As proposed by NPR, limit satellite-fed translators in the non-reserved band to local parent/primary stations, <u>and</u>...
- Define a "local station" as one that is either in the same state or in a different state but within 400km (or the 30dBu contour) of the proposed translator, as proposed by REC.

## REC is also asking the Commission to:

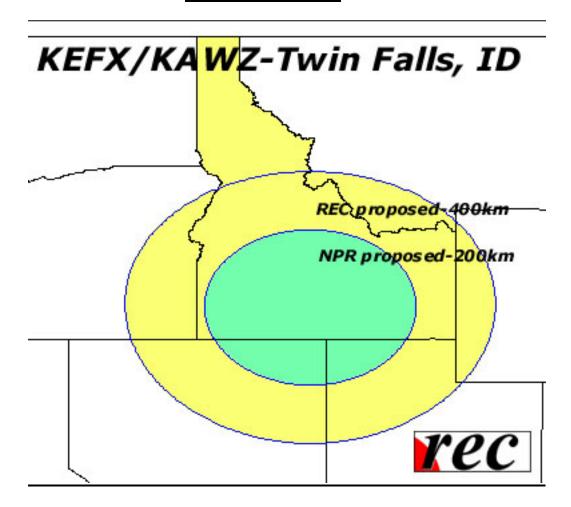
- Consider rulemaking that would protect existing satellite-fed translators in a traditional secondary status.
- Only allow distant translators in the non-reserved band if the applicant can make a showing that no reserved channel is available due to TV Channel 6 <u>however</u> the station would be subject to displacement if the channel is needed for a local LPFM or translator station.
- Apply a "sub-secondary" status to any <u>new</u> distant translator in the reserved band that is applied for after a specific date (such as the implementation date).
- Allow a local translator or LPFM station to be able to displace a "sub-secondary" distant translator (one applied for after the implementation date) if no other reserved or non-reserved channels are available. (This includes displacement applications by local translators, LPFM and existing Class-D stations)
- Withdraw our comments supporting microwave transmission as an alternative to satellite.

This modified proposal will bring a reasonable balance to all interests including NCE stations operating local translators, NCE stations operating distant translators, commercial stations, the future of the Low Power FM service as well as the expansion of local radio services in rural areas across America.

December 29, 2002.

#### APPENDIX A

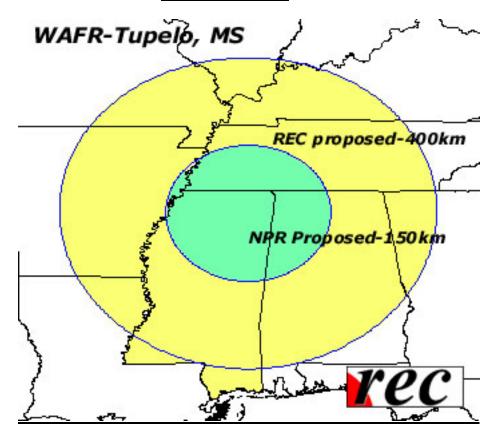
THE AREAS WHERE THE CALVARY CHAPEL OF TWIN FALLS STATIONS (KAWZ/KEFX) WOULD BE ABLE TO OBTAIN SATELLITE-FED TRANSLATORS UNDER REC'S PROPOSAL AND NPR'S OPTION USING A FIXED RADIUS BASED ON STATION CLASS



Both KAWZ and KEFX are Class C stations and under NPR's proposal would have a 200km contour where they can establish a satellite-fed translator. REC's proposal doubles that distance to 400km and includes all areas within the same state.

# APPENDIX B

THE AREAS WHERE THE AMERICAN FAMILY ASSOCIATION STATION WAFR WOULD BE ABLE TO OBTAIN SATELLITE-FED TRANSLATORS UNDER REC'S PROPOSAL AND NPR'S OPTION USING A FIXED RADIUS BASED ON STATION CLASS



WAFR is a Class C1 station and is entitled to a 150 km contour under NPR's proposal.

# APPENDIX C TV BROADCAST STATIONS MOST LIKELY TO OPERATE ON CHANNEL 6 AFTER THE DTV TRANSITION

Facility	Call	City of License	NTSC Ch.	DTV Ch.	Comments
18066	KTVM	Butte, MT	6	2	Ch. 6 DTV assigned in Low-Band
66414	KBSD	Ensign, KS	6	5	Ch. 6 DTV assigned in Low-Band
86538	KBNY	Ely, NV	6	6	Single Channel post-1997 assignment.
83729	KBCJ	Vernal UT	6	6	Single Channel post-1997 assignment.
8651	KTOO	Juneau, AK	3	6	May go back to Ch. 3 after transition
70592	WDTV	Weston, WV	5	6	May go back to Ch. 5 after transition
35855	KVIE	Sacramento	6	53	Ch. 6 DTV assigned out of core
48666	WECT	Wilmington, NC	6	54	Ch. 6 DTV assigned out of core
43203	WABG	Greenwood, MS	6	54	Ch. 6 DTV assigned out of core
35434	KOTV	Tulsa, OK	6	55	Ch. 6 DTV assigned out of core
53859	WIPR	San Juan, PR	6	55	Ch. 6 DTV assigned out of core
6885	KWQC	Davenport, IA	6	56	Ch. 6 DTV assigned out of core
53313	KSRE	Minot, ND	6	57	Ch. 6 DTV assigned out of core
9917	WCML	Alpena, MI	6	57	Ch. 6 DTV assigned out of core
71293	WKMG	Orlando, FL	6	58	Ch. 6 DTV assigned out of core
22129	WDAY	Fargo, ND	6	59	Ch. 6 DTV assigned out of core
74420	WLNS	Lansing, MI	6	59	Ch. 6 DTV assigned out of core
8616	WPVI	Philadelphia, PA	6	64	Ch. 6 DTV assigned out of core

NOTE: One of the original DTV Channel 6 allotments was placed in New Haven CT for WCTX on NTSC Channel 59. That allotment was changed to Channel 39.

#### APPENDIX D PROPOSED RULE CHANGE

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Variable text based on the outcome of the rulemaking in [BRACKETS]

#### Sec. 74.1231 Purpose and permissible service.

- (b) An FM translator may be used for the purpose of retransmitting the signals of a primary FM radio broadcast station or another translator station the signal of which is received directly through space, converted, and suitably amplified. However, an FM translator providing fill-in service may use any terrestrial facilities to receive the signal that is being rebroadcast. An FM booster station or a noncommercial educational FM translator station that is operating on a reserved channel (Channels 201-220), THAT WAS AUTHORIZED PRIOR TO <EFFECTIVE DATE> and is owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means, including, but not limited to, satellite and terrestrial microwave facilities. Provided, however, that an applicant for a noncommercial educational translator operating on a reserved channel (Channel 201-220) and owned and operated by the licensee of the primary noncommercial educational FM station it rebroadcasts complies with either paragraph (b)(1) or (b)(2) of this section:
  - (1) The applicant demonstrates that:
- (i) The transmitter site of the proposed FM translator station is within 80 kilometers of the predicted 1 mV/m contour of the primary station to be rebroadcast; or,
- (ii) The transmitter site of the proposed FM translator station is more than 160 kilometers from the transmitter site of any authorized full service noncommercial educational FM station; or,
- (iii) The application is mutually exclusive with an application containing the showing as required by Sec. 74.1231(b)(2) (i) or (ii) of this section; or,
  - (iv) The application is filed after October 1, 1992.
- (2) If the transmitter site of the proposed FM translator station is more than 80 kilometers from the predicted 1 mV/m contour of the primary station to be rebroadcast or is within 160 kilometers of the transmitter site of any authorized full service noncommercial educational FM station, the applicant must show that:
- (i) An alternative frequency can be used at the same site as the proposed FM translator's transmitter location and can provide signal coverage to the same area encompassed by the applicant's proposed 1 mV/m contour; or,
- (ii) An alternative frequency can be used at a different site and can provide signal coverage to the same area encompassed by the applicant's proposed 1 mV/m contour.

# 74.12XX SATELLITE AND MICROWAVE FED NCE-FM TRANSLATORS AUTHORIZED AFTER <DATE OF NPRM>

- (A) A NON-COMMERCIAL EDUCATIONAL FM TRANSLATOR THAT IS AUTHORIZED AFTER <EFFECTIVE DATE> AND IS OWNED AND OPERATED BY THE LICENSEE OF THE PRIMARY NON-COMMERCIAL EDUCATIONAL STATION IT REBROADCASTS MAY USE ALTERNATIVE MEANS INCLUDING BUT NOT LIMITED TO SATELLITE OR MICROWAVE FACILITIES IN ACCORDANCE WITH THIS SECTION.
- (B) IF THE STATION BEING REBROADCAST IS IN A DIFFERENT STATE AND IS [AT LEAST 400KM FROM THE PRIMARY STATION/OUTSIDE THE 30 dBu SERVICE (50,50) CONTOUR] OF THE PRIMARY STATION:
  - (1) OPERATION IS ONLY PERMITTED ON CHANNELS 201-220 EXCEPT AS NOTED IN PARAGRAPH (B)(2) OF THIS SECTION.
  - (2) OPERATION ON CHANNELS 221-300 MAY BE SPECIFIED IF THE PROPOSED TRANSLATOR CAN NOT MEET THE TV CHANNEL 6 INTERFERENCE CRITERIA OF SEC. 74.1205.
  - (3) THE NON-COMMERCIAL EDUCATIONAL TRANSLATOR IS SUBJECT TO DISPLACEMENT IF A SHOWING IS MADE THAT NO ALTERNATE CHANNELS ARE AVAILABLE FOR THE FOLLOWING APPLICANT TYPES:
    - (a) NON-COMMERCIAL EDUCATIONAL THAT IS LOCATED EITHER IN THE SAME STATE OR WITHIN [400KM/THE 30 dBu SERVICE (50,50) CONTOUR] OF THE PRIMARY STATION.
    - (b) LOW POWER FM (LP-100 OR LP-10).
    - (c) CLASS-D (SECONDARY) DISPLACEMENT APPLICATIONS IN COMPLIANCE WITH SEC. 73.512(d).
    - (d) FOR CHANNELS 221-300, COMMERCIAL FM TRANSLATOR AND BOOSTER STATIONS
- (C) STATIONS AUTHORIZED UNDER THIS SECTION MUST ALSO COMPLY WITH EITHER SEC. 74.1231(B)(1) OR SEC. 74.1231(B)(2).

#### AMEND EXISTING RULE §73.807

Subpart G--Low Power FM Broadcast Stations (LPFM)

Sec. 73.807 Minimum distance separation between stations.

- (d) In addition to meeting the separations (a) through (c), LPFM applications must meet the minimum separation requirements with respect to authorized FM translator stations, cutoff FM translator applications, and FM translator applications filed prior to the release of the Public Notice announcing the LPFM window period EXCEPT AS SHOWN IN PARAGRAPH (H) OF THIS SECTION.
- (H) LP100 AND LP10 STATIONS ARE NOT REQUIRED TO PROTECT CERTAIN SATELLITE OR MICROWAVE FED TRANSLATORS AUTHORIZED IN ACCORDANCE WITH SEC 74.12XX (B) IF THE LP100 OR LP10 APPLICANT CAN MAKE A SHOWING THAT NO OTHER CHANNELS ARE AVAILABLE WITHOUT THE DISPLACEMENT OF THE SATELLITE OR MICROWAVE FED TRANSLATOR.

#### AMEND EXISTING RULE §73.509

Subpart C--Noncommercial Educational FM Broadcast Stations

Sec. 73.509 Prohibited overlap.

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(b)(1)An application by a Class D (secondary) station, other than an application to change class, will not be accepted if the proposed operation would involve overlap of signal strength contours with any other station as set forth below:

Frequency separation	Contour of proposed station	Contour of any other station
Co-channel	0.1 mV/m (40 dBu). 0.5 mV/m (54 dBu). 10 mV/m (80 dBu) 100 mV/m (100 dBu)	1 mV/m (60 dBu). 1 mV/m (60 dBu).

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(2) CLASS D (SECONDARY) STATIONS ARE NOT REQUIRED TO PROTECT CERTAIN SATELLITE OR MICROWAVE FED TRANSLATORS AUTHORIZED IN ACCORDANCE WITH SEC 74.12XX (B) IF THE CLASS D (SECONDARY) CAN MAKE A SHOWING THAT NO OTHER CHANNELS ARE AVAILABLE WITHOUT THE DISPLACEMENT OF THE SATELLITE OR MICROWAVE FED TRANSLATOR.

#### AMEND EXISTING RULE §74.1204

Subpart L--FM Broadcast Translator Stations and FM Broadcast Booster Stations

Sec. 74.1204 Protection of FM broadcast, FM Translator and LP100 stations.

(K) NON-COMMERCIAL EDUCATIONAL FM TRANSLATORS NOT AUTHORIZED UNDER SEC. 74.12XX(B) AND ALL COMMERCIAL FM TRANSLATORS AND BOOSTERS ARE NOT REQUIRED TO PROTECT CERTAIN SATELLITE OR MICROWAVE FED TRANSLATORS AUTHORIZED IN ACCORDANCE WITH SEC 74.12XX (B) IF THE APPLICANT CAN MAKE A SHOWING THAT NO OTHER CHANNELS ARE AVAILABLE WITHOUT THE DISPLACEMENT OF THE SATELLITE OR MICROWAVE FED TRANSLATOR.